

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

21 CRIM 045

UNITED STATES OF AMERICA

- v. -

JOSHUA PANTOJAS,

Defendant.

SEALED INDICTMENT

21 Cr.

21 CRIM 045

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COUNT ONE

The Grand Jury charges:

1. On or about December 10, 2019, in the Southern District of New York, JOSHUA PANTOJAS, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, PANTOJAS lured a victim selling goods on an online marketplace to a location in the Bronx and robbed the victim at knifepoint.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT TWO

The Grand Jury further charges:

2. On or about December 26, 2019, in the Southern District of New York, JOSHUA PANTOJAS, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, PANTOJAS lured a victim selling goods on an online marketplace to a location in the Bronx and robbed the victim using what appeared to be a firearm.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The Grand Jury further charges:

3. On or about December 28, 2019, in the Southern District of New York, JOSHUA PANTOJAS, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3),

and aided and abetted the same, to wit, PANTOJAS lured a victim selling goods on an online marketplace to a location in the Bronx and robbed the victim using what appeared to be a firearm.

(Title 18, United States Code, Sections 1951 and 2.)

**FORFEITURE ALLEGATIONS**

4. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, JOSHUA PANTOJAS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the

Court;

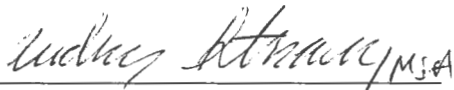
d. has been substantially diminished in value; or

e. has been commingled with other property which  
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21,  
United States Code, Section 853(p) and Title 28, United States  
Code, Section 2461(c), to seek forfeiture of any other property  
of the defendant up to the value of the above forfeitable  
property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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AUDREY STRAUSS  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

Joshua Pantojas,

Defendant.

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SEALED INDICTMENT

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(18 U.S.C. §§ 1951 and 2.)

AUDREY STRAUSS  
United States Attorney.

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foreperson

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